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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

IN THE MATTER OF:

TRINITY BROADCASTING OF FLORIDA, INC.
and
GLENDALE BROADCASTING COMPANY

MM DOCKET NO. 93-75

Miami, Florida

DATE OF HEARING: December 23, 1993

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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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 In the matter of:)

TRINITY BROADCASTING OF FLORIDA, INC.)
 and)
 GLENDALE BROADCASTING COMPANY)

MM DOCKET NO. 93-75

Miami, Florida)
 -----)

The above-entitled matter came on for hearing
 pursuant to Notice before Judge Joseph Chachkin,
 Administrative Law Judge, 2000 L Street, Washington, D.C.,
 20554, in Courtroom 3, on Thursday, December 23, 1993,
 at 9:33 a.m.

APPEARANCES:

On behalf of Trinity Broadcasting of Florida, Inc.:

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 CHRISTOPHER HOLT, Esquire
 EUGENE MULLIN, Esquire
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On behalf of Glendale Broadcasting Company:

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On behalf of S.A.L.A.D.:

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1 APPEARANCES (Continued):

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I N D E X

<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
Mr. Colby May				
By Mr. Topel			3511	
By Mr. Cohen				3574
By Mr. Schonman				3628

E X H I B I T S

<u>Exhibit</u>	<u>Identified</u>	<u>Received</u>	<u>Rejected</u>
TBF Exhibit 120	3510	3525	
TBF Exhibit 121	3510	3525	
TBF Exhibit 122	3544	3555	
TBF Exhibit 123	3560	3565	

Hearing began: 9:33 a.m. Hearing Ended: 1:15 p.m.

P R O C E E D I N G S

1 JUDGE CHACHKIN: Mr. Topel, you have some questions?

2 MR. TOPEL: Yes, Your Honor. We do have some
3 redirect. Mr. May, I'd like you to start with by having three
4 documents in front of you. I'm going to ask my colleague,
5 Mr. Holt, to give you a copy of Glendale Exhibit 220.

6 MR. COHEN: What is that document?

7 MR. TOPEL: That, that is a portion of the
8 Opposition --

9 MR. HOLT: Here you go.

10 MR. TOPEL: -- to Petition to Deny --

11 MR. COHEN: Did I get that?

12 MR. TOPEL: -- the, the TBF opposition to the
13 Glendale Petition to Deny.

14 MR. COHEN: Right. I thank you.

15 MR. TOPEL: And, Your Honor, I would ask to have
16 marked for identification as TBF Exhibit 120, a document
17 consisting of 155 pages, which is the entirety of the
18 Opposition to Petition to Deny that was filed. And, Your
19 Honor, I, I would request leave to supply the Court reporter
20 with copies of the subsequent -- I seem to be short copies.

21 (Asides.)

22 JUDGE CHACHKIN: All right. Do you have a copy --
23 or did you --

24 MR. TOPEL: Can we go off for just one second?

1 JUDGE CHACHKIN: All right. We'll --

2 (Off the record. Back on the record.)

3 JUDGE CHACHKIN: You did -- Mr. Topel, you're one
4 document short and you request leave to supply the reporter
5 with a second copy?

6 MR. TOPEL: Actually, when the witness is finished,
7 I'll have the second copy, but --

8 JUDGE CHACHKIN: All right.

9 MR. TOPEL: -- the witness has the second copy of
10 one.

11 JUDGE CHACHKIN: Oh, well, then fine. Then you're
12 not really short?

13 MR. TOPEL: Not really, at that time, but, but I ask
14 leave as to --

15 JUDGE CHACHKIN: Well, why, why don't you have the
16 reporter mark the cop-- mark the original and then give it to
17 the witness to look at.

18 MR. TOPEL: Thank you. In any event, Your Honor, I
19 ask that this document be marked for identification as TBF
20 Exhibit 120.

21 JUDGE CHACHKIN: The document described will be so
22 marked. What was the last number, wasn't it 1 -- 115 or
23 something?

24 MR. HOLT: -- 119, I believe, Your Honor.

25 JUDGE CHACHKIN: Was it 119?

1 MR. HOLT: Sure.

2 JUDGE CHACHKIN: We don't have a 120 in this place.

3 MR. HOLT: I believe 119 was Jane Duff's purchase
4 orders and -- consisting of 107 pages.

5 JUDGE CHACHKIN: All right. So this is 120?

6 (Whereupon, the document referred to
7 as TBF Exhibit 120 was marked for
8 identification.)

9 MR. TOPEL: And, Your Honor, I would ask to have
10 marked for identification as TBF Exhibit 121, a document
11 consisting of 145 pages, which is a response that was filed
12 with the FCC in the Wilmington, Delaware, matter that is
13 incorporated in the opposition to the petition to deny, as
14 we'll see.

15 JUDGE CHACHKIN: The document described will be
16 marked for identification as Trinity Exhibit 121.

17 (Whereupon, the document referred to
18 as TBF Exhibit 121 was marked for
19 identification.)

20 MR. TOPEL: Okay. Does everyone who needs one, have
21 one?

22 MR. MCCURDY: Thank you. I have one.

23 MR. TOPEL: Now --

24 MR. COHEN: You said you were giving a third
25 document to him?

1 MR. TOPEL: The third one he has is Glendale Exhibit
2 220.

3 MR. COHEN: Thank you.

4 JUDGE CHACHKIN: Now 121 is, what did you say that
5 was? That was the opposition to the Wilmington?

6 MR. TOPEL: It, it's a response in Wilmington.
7 There is another Wilmington document to which I'll refer.
8 That's already in the record. It's a Mass Media Bureau
9 exhibit.

10 JUDGE CHACHKIN: All right.

11 RE-DIRECT EXAMINATION

12 BY MR. TOPEL:

13 Q Now, Mr. May, if you would, please turn to page five
14 of Glendale Exhibit 220.

15 JUDGE CHACHKIN: 120?

16 MR. TOPEL: I'm sorry, 2 -- no, Glendale. This is
17 the Glendale 220.

18 JUDGE CHACHKIN: Oh, Glendale. I see. All right.

19 BY MR. TOPEL:

20 Q And you will see there a reference to a second
21 titled prior related proceedings, is that correct?

22 A Yes, sir.

23 Q And if you turn to page seven of that document, you
24 will see that in the last paragraph of the section "prior
25 related proceedings," there are, are -- is this language, and

1 I'll just read it to save time, "the Commission has not acted
2 on NMTV's November 18, 1991, request for declaratory ruling.
3 A copy of that request is appended to this opposition. See
4 Exhibit 1. And TBF hereby supports NMTV's request for
5 declaratory ruling." I'm correct, am I not, when I, when I
6 look at Glendale Exhibit 220, the document referred to in that
7 paragraph, Exhibit 1, is missing?

8 A That's correct, sir.

9 Q Thank you. Now if you would turn to TBF Exhibit
10 120. I'd like to ask you to turn to page 36 of that document,
11 which happens to be the third page of text in the exhibit that
12 was omitted in the exhibit about which you were examined.

13 A Yes, sir.

14 Q Okay. And I'm just going to read a paragraph before
15 I ask you a question about it. Looking at the first full
16 paragraph on that page.

17 JUDGE CHACHKIN: What page? I missed that.

18 MR. TOPEL: Page 36 of the exhibit, Your Honor.

19 JUDGE CHACHKIN: Okay. 120?

20 MR. TOPEL: Of Exhibit 120.

21 JUDGE CHACHKIN: Go ahead. Okay.

22 BY MR. TOPEL:

23 Q I'd like to read this language, Mr. May. This
24 document states as follows, "the facts also show that NMTV has
25 close ties with Trinity Broadcasting Network. Two of NMTV's

1 | directors are salaried employees of Trinity Broadcasting
2 | Network, and all but two of the corporation's officers are
3 | salaried employees of Trinity. NMTV receives favorable rates
4 | on construction financing loans from Trinity, which are repaid
5 | out of revenues realized from a program affiliation agreement
6 | between NMTV and Trinity. NMTV utilizes the same consultants,
7 | such as engineers and attorneys, as are used by Trinity." My
8 | question, Mr. May, is did you file that with the Federal
9 | Communications Commission?

10 | A Yes, sir.

11 | Q And can you tell me, did you serve a copy of that on
12 | counsel for Glendale?

13 | A Yes, sir.

14 | Q Now you recall, I believe, that -- or you will
15 | recall that Mr. Cohen asked you some questions about whether
16 | your opposition to Glendale's petition to deny the February --
17 | the Glendale Exhibit 220, whether that opposition makes
18 | reference to Jane Duff's duties as a TBN executive and as
19 | assistant to the president. And I'd like to ask you, sir, to
20 | turn to page 44 of TBF Exhibit 120, which again is included in
21 | the exhibit that was not included in Glendale Exhibit 220, and
22 | let me know when you have page 44.

23 | A Yes, sir. I have it.

24 | Q And, again, as a predicate, let me just read what's
25 | stated there. It there states, "Mrs. Duff --", in paragraph

1 seven, "Mrs. Duff has been involved with broadcasting for over
2 11 years as a senior executive for Trinity. In addition to
3 her position with NMTV, she is a salaried employee of Trinity
4 Broadcasting Network and serves in a senior management
5 position as assistant to the president, the president being
6 Paul F. Crouch." And then if you go to the last sentence of
7 that paragraph, it says, "Mrs. Duff is also the director which
8 is most involved in overseeing the routine and general
9 operation of NMTV." And my question to you, sir, is did you
10 file that information with the FCC in your opposition
11 pleading?

12 A Yes, sir.

13 Q And did you serve a copy of that on counsel for
14 Glendale?

15 A Yes, sir.

16 JUDGE CHACHKIN: What, what is the point that, that
17 -- I'm having difficulty understanding where you're going with
18 this.

19 MR. TOPEL: Well, Your Honor, a, a, a very serious
20 attack was made that there was a lack of candor in Glendale
21 Exhibit 220 because this very information was not disclosed in
22 an isolated part of that opposition that Mr. Cohen pointed to.

23 JUDGE CHACHKIN: Right.

24 MR. TOPEL: The witness indicated it had been
25 incorporated by reference. Not only had it been incorporated

1 by reference, but it was attached to the pleading.

2 JUDGE CHACHKIN: All right. I just didn't quite
3 understand where you were going. Go ahead.

4 BY MR. TOPEL:

5 Q Thank you. Now on the issue of incorporation by
6 reference, would you turn, sir, please to page 35 of TBF
7 Exhibit 120.

8 A Yes, sir. I have it.

9 Q And in the last full paragraph, let me just read
10 this, "in this request for a declaratory ruling, NMTV
11 incorporates by reference the response filed with respect to
12 the Wilmington, Delaware application." Did you file that with
13 the Federal Communications Commission in connection with your
14 opposition in the Miami matter?

15 A Yes, sir.

16 Q And did you serve a copy of that on counsel for
17 Glendale?

18 A Yes, sir.

19 Q And looking further, on page 40 to 41, in footnote
20 2, and particularly on 40 -- on page 41, the end of that
21 footnote, it states that that response, which is referring to
22 the response in the Wilmington matter, is incorporated by
23 reference herein. My question, sir, did you file that with
24 the Federal Communications Commission in connection with your
25 opposition in Miami?

1 A Yes, sir.

2 Q And did you serve a copy of that on counsel for
3 Glendale Broadcasting?

4 A Yes, sir.

5 Q And turning to page 67 --

6 JUDGE CHACHKIN: Still at TBF Exhibit 120?

7 MR. TOPEL: Still at the last question on TBF 120.

8 BY MR. TOPEL:

9 Q Turning to page 67, the beginning of paragraph 37
10 where it states, "NMTV does not deny, however, that it has
11 long-standing and pervasive ties with Trinity, as outlined
12 here, and as more fully outlined in NMTV's response," that
13 response being the one that was incorporated by reference.
14 And my question, sir, is did you file that with the Federal
15 Communications Commission in connection with your opposition?

16 A Yes, sir.

17 Q And did you serve a copy of that on counsel for
18 Glendale Broadcasting?

19 A Yes, sir.

20 Q Now turning to TBF Exhibit 121.

21 A I have it, sir.

22 Q You, you recall that you were asked questions about
23 the disclosure, disclosures that were made in Glendale Exhibit
24 220, concerning Mrs. Duff's duties and relationship with
25 Trinity. Turn, if you would, please, to page 17 of TBF

1 Exhibit 121.

2 A Yes, sir. I have it.

3 Q And, and I should ask you, sir, is this document the
4 res-- part -- all or part of the response in Wilmington that
5 was referred to in the opposition to the petition to deny in
6 the Trinity matter -- in the Trinity of Florida matter?

7 A Yes, sir.

8 Q Okay. Now, again, in the interest of just getting
9 through this, let me read into the record what some of the
10 things that are said. First of all, on page 17, that, that is
11 a portion of an affidavit of whom, sir?

12 A Of Mrs. Jane Duff.

13 Q Thank you. And on page 17, in paragraph 17, the
14 first sentence reads, "I am a salaried employee of Trinity
15 Broadcasting Network with the title of assistant to the
16 president." Then in paragraph 19, it reads as follows,
17 "generally, my areas of responsibility involve TBN's legal
18 affairs, its public affairs, station acquisition, community
19 outreach, and public relations. As part of my responsibi-
20 lities for legal matters, I review all FCC applications and am
21 Trinity's day-to-day contact with communications counsel. I
22 am responsible, with our local and FCC counsel, for EEO
23 compliance and compliance with other state and local rules and
24 regulations, particularly with respect to employment matters.
25 I am generally responsible for interfacing with counsel

1 concerning any litigation or administrative proceedings in
2 which Trinity is involved. I generally oversee the production
3 of TBN's public affairs programming, and am primarily
4 responsible for the ascertainment of community needs in KTBN's
5 service area. I supervise the formulation and formatting of
6 the programs problems list that is inserted in the public
7 file, and ensure that the public file is properly kept up to
8 date. I am responsible for a great deal of KTBN's public
9 involvement with the community and, in the past, have appeared
10 at civic organizations, chamber of commerce luncheons,
11 churches, schools, etc., to represent the station. I now
12 supervise other station representatives to ensure that the
13 station is well-represented in the community. As part of my
14 job of reviewing FCC applications, I am responsible for all of
15 TBN's translator applications. At present, TBN has over 150
16 translators, and I review and supervise the constant efforts
17 to expand TBN's translator coverage and to improve the
18 coverage of its existing stations. During the last LPTV
19 application window, I was responsible for preparation and
20 filing of some 48 LPTV applications. I am also the primary
21 TBN representative at various industry functions. For
22 example, I participated in TBN's delegation to various cable
23 shows throughout the country, have attended several national
24 translator association conventions, and have been Trinity's
25 representative at, as well as a panel participant, in the last

1 community broadcasters' association meeting in Las Vegas."

2 My question to you, sir, is, was that information filed with
3 the FCC?

4 A Yes, it was.

5 Q And was it incorporated in the opposa -- opposition
6 to the petition to deny the TBF application, Glendale Exhibit
7 220?

8 A Yes, sir. It was.

9 JUDGE CHACHKIN: Is your point then, Mr. Topel, that
10 in September of 1991, TBN was forthcoming, at least at that
11 point, as to the activities of Mrs. Duff? I don't recall any
12 other documents between 1987 and the opposition and the
13 petitions to deny where we had such a full statement as to
14 Mrs. Duff's duty. Do you recall any such documents?

15 MR. TOPEL: Your, Your Honor, my, my, my point at
16 this time is to deal with the accusation that the February,
17 1992, opposition was lacking in candor. I will be going --

18 JUDGE CHACHKIN: I'm not going to, I'm not going to
19 argue with that point. I'm sure the Bureau --

20 MR. TOPEL: And --

21 JUDGE CHACHKIN: -- would be glad to accept it as
22 admission of all this material concerning Mrs. Duff's
23 activities perhaps was even more that we got into in the
24 actual hearing in this proceeding.

25 MR. TOPEL: I, I, I will --

1 JUDGE CHACHKIN: Let's, let's continue.

2 MR. TOPEL: And, and I will be going back to
3 whatever disclosures were made. We didn't create anything
4 new, but what was made we're going to put in for, for the
5 record.

6 JUDGE CHACHKIN: All right. Fine.

7 MR. TOPEL: Now, Mr. May, you also recall or will
8 recall, I believe, that you were asked questions about
9 disclosures about the relationships of NMTV's principles to
10 TBN, and I would like to ask you now to turn to page 17 of TBF
11 Exhibit 100 --

12 JUDGE CHACHKIN: Twenty-one?

13 MR. TOPEL: Twenty-one? Is that the one I'm --

14 JUDGE CHACHKIN: Is this the --

15 MR. TOPEL: Yes, 121.

16 MR. COHEN: What page is that?

17 MR. TOPEL: 121.

18 JUDGE CHACHKIN: And when you say page 17, you're
19 referring to the --

20 MR. TOPEL: The --

21 JUDGE CHACHKIN: -- you're, you're --

22 MR. TOPEL: -- the Bate's stamp number in the
23 lower --

24 JUDGE CHACHKIN: The Bate's stamp number, all right.

25 MR. TOPEL: -- the Bate's stamp number in the lower

1 right hand corner.

2 JUDGE CHACHKIN: Because there are two numbers, so.

3 MR. TOPEL: What? Yes, sir.

4 JUDGE CHACHKIN: Excuse me. Yes, all right.

5 MR. TOPEL: Yes, sir. It's the Bate's stamp number.

6 MR. SHOOK: Your Honor?

7 JUDGE CHACHKIN: Yes, sir?

8 MR. SHOOK: If it would shortcut this to some
9 extent, I mean I have -- the Bureau has no problem that these
10 materials were submitted to the Commission and that they say
11 what they say. And if the point of all of this is to
12 establish that, you know, Mr. May, as of September 24, 1991,
13 made certain representations to the Commission then that what
14 was disclosed is disclosed, the Bureau has no problem with
15 that.

16 MR. TOPEL: Your Honor, I, I appreciate Mr. Shook's
17 comment.

18 JUDGE CHACHKIN: All right. Go ahead, Mr. --

19 MR. TOPEL: I, I would ask a, a, just a little
20 indulgence on this end.

21 JUDGE CHACHKIN: I'm going to, I'm going to permit
22 it. Go ahead, Mr. Topel.

23 MR. TOPEL: Thank you. Concerning the relationships
24 of the officers --

25 MR. COHEN: Your Honor, our attention was directed

1 to page 117? I --

2 MR. TOPEL: No, page 17.

3 JUDGE CHACHKIN: Page 17.

4 MR. COHEN: Oh, 17. I see. I couldn't understand.

5 Thank you.

6 JUDGE CHACHKIN: All right. Go ahead..

7 BY MR. TOPEL:

8 Q And let me just read into the record what's reported
9 there. "Reverend Aguilar is the only member of NMTV's
10 officers and directors who is not paid by Trinity or works for
11 Trinity in some capacity. Paul Crouch is the president of
12 Trinity Broadcasting Network and receives a salary from the
13 Network. As noted above, I am the assistant to the president
14 of Trinity Broadcasting Network and receive a salary from TBN.
15 Matt Crouch is Paul Crouch's son and is paid by Trinity
16 Broadcasting Network as an administrative assistant to the
17 president. Charlene Williams, the head of Trinity's Computer
18 and Accounting Department, is a salaried employee of Trinity
19 Broadcasting Network." And my question, sir, is was that
20 information filed with the FCC?

21 A Yes, sir. I was.

22 Q And was it incorporated in the opposition to the
23 petition to deny the Miami renewal application that Glendale
24 filed?

25 A Yes, sir.

1 Q And, Mr. May, if you would turn to pages 49 to 51 of
2 TBF Exhibit 121.

3 JUDGE CHACHKIN: Forty-nine, did you say?

4 MR. TOPEL: Yes.

5 MR. MAY: Yes, sir. I have it.

6 BY MR. TOPEL:

7 Q First of all, Mr. May, can you look back to page 36
8 and just, for the record, whose affidavit should page 49
9 cover?

10 A This is the affidavit of Paul F. Crouch, sir.

11 Q Okay. And with, without reading it into the record,
12 am I correct that all of the information in this affidavit,
13 including the information in paragraphs 18 and 19, were filed
14 with the FCC?

15 A Yes, sir.

16 Q And were they incorporated by reference in the
17 opposition to the Miami, Florida, petition to deny Glendale
18 Exhibit 220?

19 A Yes, sir.

20 Q Thank you, sir. Now, Mr. May, turn if you would,
21 please, in Volume Six of the Mass Media Bureau exhibits.

22 JUDGE CHACHKIN: What do you want to do with these
23 two exhibits? Do you want to stick these in or --

24 MR. TOPEL: Well, I, I am, I'll move them now, Your
25 Honor. I was going to move them when I finished the line.

1 MR. MCCURDY: No objection.

2 JUDGE CHACHKIN: Any, anyone have any objection?

3 MR. COHEN: No objection.

4 JUDGE CHACHKIN: All right. Is that official notice
5 -- is that official notice, is that the purpose of this, or
6 any other purpose, or what?

7 MR. SHOOK: Your Honor, as far as the Bureau is
8 concerned, we're not worried about any limitation of purpose
9 here. I mean this is information that was filed when it was
10 filed by Trinity, and --

11 JUDGE CHACHKIN: All right. Trinity Exhibits --

12 MR. COHEN: Well, Your Honor, I, I think that I
13 would object for it to come in for the truth of the
14 proposition asserted. It comes in for what it is. It was
15 represents made to the Communi -- to the FCC and I don't think
16 it --

17 MR. SHOOK: That's all, that's all we're saying, is
18 that --

19 MR. COHEN: Okay.

20 MR. SHOOK: -- they were representations made by
21 Trinity at the times that they made.

22 MR. COHEN: Okay. That's -- I misunderstood you,
23 Mr. Shook.

24 JUDGE CHACHKIN: All right. The Trinity Exhibits
25 120 and 121 are received.

1 (Whereupon, the documents previously
2 identified as TBF Exhibit 120 and TBF
3 Exhibit 121 were received into
4 evidence.)

5 MR. TOPEL: Now, Mr. May, in Bureau -- Mass Media
6 Bureau Exhibit 353, these are portions of the opposition to
7 the petition to deny that was filed in the Wilmington matter,
8 and I would indicate that we have reviewed the portions that
9 were omitted and we're satisfied they were immaterial, but I
10 wanted to state that on the record. And in, in reference to
11 the question you were asked by Glendale's counsel about
12 whether your opposition pleading in the Florida matter had
13 referred to Mrs. Duff's duties at TBN, I just would like to
14 read at the bottom of page 20 of the TBF opposition --

15 MR. COHEN: What document are we on now, Your Honor,
16 I want to make sure the --

17 JUDGE CHACHKIN: What? Which -- what exhibit is
18 this? Bureau exhibit what?

19 MR. TOPEL: Bureau -- Mass Media Bureau Exhibit 353.

20 JUDGE CHACHKIN: 353.

21 MR. COHEN: Well, let me get -- excuse me.

22 JUDGE CHACHKIN: And what page is this now?

23 MR. TOPEL: Page 20, Your Honor. The circled page
24 at the bottom.

25 JUDGE CHACHKIN: Yes.

1 MR. COHEN: Could I have one second, Your Honor,
2 while I find it?

3 JUDGE CHACHKIN: Yes.

4 MR. COHEN: Thank you, Your Honor. What page is
5 that, Mr. Topel?

6 MR. TOPEL: Excuse me?

7 MR. COHEN: I said which page?

8 MR. TOPEL: Page 20.

9 JUDGE CHACHKIN: Page 20.

10 MR. COHEN: Twenty. Excuse me. Thank you.

11 MR. TOPEL: Okay. And at the bottom of page 20, I
12 would just like to read a, an excerpt. It there states,
13 "Mrs. Duff is the assistant to the president of Trinity
14 Broadcasting Network, a title which means what is says. She
15 holds virtually the second highest management office in the
16 network's hierarchy." My question to you, sir, is did you
17 file that document in the Wilmington matter?

18 A Yes, sir.

19 Q And was it incorporated in your opposition that you
20 served on counsel for Glendale in the Florida matter?

21 A Yes, sir.

22 Q Now --

23 JUDGE CHACHKIN: I don't understand why we spent all
24 those, I must say, days of hearing trying to get out from
25 these peop-- Mrs. Duff what her roles were, when we, it seems

1 to me, could have stipulated on the basis of material,
2 admissions already made by the principles. But, but we're
3 over that now and, it seems to me, we could have saved a lot
4 of time by asking the party to sub-- to admit the certain
5 facts, because it's set forth here apparently in, in the, at
6 least in the 1991 and 1992 pleadings.

7 MR. SHOOK: We, we have our reasons, Your Honor, but
8 I don't think there is --

9 JUDGE CHACHKIN: All right. All right.

10 MR. SHOOK: -- any point served in --

11 JUDGE CHACHKIN: All right.

12 MR. SHOOK: -- going over what they are.

13 JUDGE CHACHKIN: Yes, okay. Continue, Mr. Topel.

14 MR. TOPEL: Thank you, Your Honor. I believe you
15 were also asked some questions about your disclosure prior to
16 a, I think it was a March 31 letter, March 31, 1992, letter of
17 common officers between NMTV and Translator TV or TBN. And I
18 would like my colleague, Mr. Holt, to provide you with a copy
19 of Trinity Broadcasting of Florida Exhibit 101, and I'm going
20 to be referring you to Tab R.

21 MR. HOLT: A copy of TBF Exhibit 101, Tab R, is now
22 in front of the witness.

23 JUDGE CHACHKIN: Yes, oh, I -- 101, Tab R, did you
24 say?

25 MR. TOPEL: Yes, it's, it's in Volume Two of TBF

1 Exhibit 101.

2 MR. MAY: I have it, Your Honor. Yes, sir, I have
3 it.

4 JUDGE CHACHKIN: Yes, all right. The parties seem
5 to have it. We can proceed.

6 BY MR. TOPEL:

7 Q Okay. Thank you. With reference to the questions
8 about disclosures of common officers, look if you would
9 initially, Mr. May, at TBF Exhibit 101, Tab R, page 1, and I
10 will tell you that that is an ownership report filed for TBN
11 and other TBN companies that are well-known on this record,
12 filed with the Commission on March 18th, 1985, and stamped as
13 received on that date. And I would like to ask you, if you
14 would, Mr. May, turn to page seven of Tab R.

15 A Yes, sir. I have it.

16 Q And do you see an entry on that page for a company
17 called Translator Television, Inc.?

18 A Yes, sir.

19 Q And can you tell me, sir, what is the name and
20 position of the fourth person identified in the list of
21 officers for Translator Television, Inc.?

22 A Philip A. Crouch, assistant secretary, sir.

23 Q And if you turn back now to page five, what is the
24 name of the -- name and position of the fourth person
25 identified as an officer of Trinity Broadcasting Network?